

1 Carl J. Oreskovich, WSBA #12779  
2 Andrew M. Wagley, WSBA #50007  
3 Etter, McMahon, Lamberson,  
4 Van Wert & Oreskovich, P.C.  
5 618 West Riverside Avenue, Suite 210  
6 Spokane, WA 99201  
7 (509) 747-9100  
8 (509) 623-1439 Fax  
9 Email: carl@ettermcmahon.com  
10 Email: awagley@ettermcmahon.com  
11 *Attorneys for Defendant Ronald C. Ilg, MD*

12 UNITED STATES DISTRICT COURT  
13 EASTERN DISTRICT OF WASHINGTON

14 UNITED STATES OF AMERICA,

15  
16 Plaintiff,

17 v.  
18

19 RONALD CRAIG ILG,

20 Defendant.  
21

Case No. 2:21-cr-00049-WFN

**DEFENDANT'S SENTENCING  
MEMORANDUM**

Sentencing Hearing:

January 24, 2023 at 10:00 am

22  
23 COMES NOW, Defendant RONALD CRAIG ILG, by and through his  
24 attorneys of record, Carl J. Oreskovich and Andrew M. Wagley of Etter,  
25 McMahon, Lamberson, Van Wert & Oreskovich, P.C., and hereby respectfully  
26 submits the following Sentencing Memorandum.  
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28

29 This Sentencing Memorandum is supported by the previous Forensic  
30 Psychological Evaluation of Michael Stanfill, Ph.D, as well as the recent  
31  
32

1 Clinical Treatment Summary by Jennifer Van Wey, Psy.D.<sup>1</sup> As indicated fully  
 2  
 3 below, Dr. Ilg respectfully requests the Court sentence him to sixty months  
 4  
 5 confinement on the low end of the Rule 11(c)(1)(C) Plea Agreement based upon  
 6  
 7 his individual characteristics, his underlying mental health conditions attributing  
 8  
 9 to his criminal behavior, and his powerful significant fall from grace.

### 10 **BACKGROUND**

11 Before the Court for sentencing is Defendant Ronald C. Ilg, MD (“Dr.  
 12 Ilg”). On August 10, 2022, Dr. Ilg pled guilty to two counts of Threats in  
 13  
 14 Interstate Commerce in violation of 18 U.S.C. § 875(c). (*See* ECF No. 142.)  
 15  
 16 Pursuant to the Rule 11(c)(1)(C) Plea Agreement, “the United States and  
 17  
 18 Defendant agree that the appropriate disposition of the case falls within a range  
 19  
 20 of 60-96 months custody” and “agree to make sentencing recommendations  
 21  
 22 within this range to the Court.” (*Id.* at 3.) Dr. Ilg hereby expressly incorporates  
 23  
 24 Defendant’s Objections to Draft Presentence Investigation Report as if restated  
 25  
 26 verbatim herein. (*See* ECF No. 146.)

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27  
 28 <sup>1</sup> The Forensic Psychological Evaluation of Dr. Stanfill (hereinafter “Stanfill  
 29 Report”) has previously been filed under seal. (ECF No. 66.) Similarly, the  
 30 Clinical Treatment Summary of Dr. Van Wey (hereinafter “Van Wey Report”) is  
 31 accompanied by a Motion to Seal. Although Dr. Ilg seeks to have these  
 32 Reports filed under seal, the excerpts quoted in this brief are the conclusions  
 reached, as opposed to specific private medical details.

1 By way of background, Dr. Ilg was born in Bellingham, WA and is the  
2 sixth of eight children. Dr. Ilg grew up in a small, farming community in the  
3 Willamette Valley of Oregon and attended Western Oregon State College. He  
4 graduated from Oregon Health Sciences University School of Medicine in 1994.  
5 Following a Pediatric Residency and Perinatal-Neonatal Fellowship Program in  
6 Portland, Dr. Ilg moved to Spokane in 2003 to practice Neonatology. He is  
7 Board Certified in Pediatrics and Neonatology. As a Neonatologist in Spokane,  
8 Dr. Ilg has worked at Deaconess Hospital and Sacred Heart Medical Center,  
9 including serving as the Director of the Deaconess Intensive Care Unit, (“ICU”)  
10 and managing member of his medical group. Dr. Ilg held many professional  
11 certifications, including dual Board Certifications in Pediatrics and Neonatal-  
12 Perinatal Medicine.  
13

14 In addition to being a practicing physician, Dr. Ilg previously volunteered  
15 as Executive Director and Chief Medical Officer of Maddie’s Place, a nonprofit  
16 focused on medical care for drug dependent newborns and their mothers. Prior  
17 to his arrest, he was also a member of the choir at St. Aloysius Gonzaga  
18 Catholic Church and the Mount Spokane Volunteer Ski Patrol, serving as their  
19 Medical Director. Furthermore, Dr. Ilg owns his home, as well as, a cherry  
20 orchard in Walla Walla, WA with his ex-wife, Correna Cockrill.  
21

1           Importantly, Dr. Ilg has no criminal history. He has substantial ties to the  
2  
3 community, including his ex-wife Corrina and two sons, who all live in the  
4  
5 Eastern District of Washington. Prior to his arrest, Dr. Ilg resided at his current  
6  
7 home in Spokane since 2003. Dr. Ilg has been in custody at the Spokane County  
8  
9 Jail since April 16, 2021—almost two years.

10           Dr. Ilg has accepted responsibility for his crimes and the impact on the  
11  
12 victims. He is remorseful for his actions and the turmoil he has caused.  
13  
14 Separate and apart from this criminal action, Dr. Ilg’s actions have sparked  
15  
16 multiple collateral consequences that have further destroyed his life. This  
17  
18 includes, but is not limited to, the loss of custody and contact with his young son  
19  
20 (mothered by Victim 2), actions against his medical license by disciplinary  
21  
22 action instituted by the Washington Medical Commission (“WMC”), and the  
23  
24 loss of his professional reputation and career.

25           The impetus of Dr. Ilg’s criminal action started with mental health issues  
26  
27 stemming from his wrongful discharge from his former practice group, Mednax,  
28  
29 along with external, personal stressors in his life. Prior to his termination, Dr.  
30  
31 Ilg helped grow and expand the practice group, serving as a managing member  
32  
in addition to practicing Neonatology full time. In Spring 2019, Dr. Ilg was the  
subject of a baseless human resources (“HR”) investigation by his employer,

1 Mednax, ultimately targeting Dr. Ilg's sexual identity and personal lifestyle.  
2  
3 The nature of the questions and investigation destroyed his reputation within the  
4  
5 group and eventually the medical community. The destruction of Dr. Ilg's  
6  
7 reputation, professional career, and personal life led him to a severe depression.  
8  
9 He went on medical leave.

10 Upon Dr. Ilg's return from medical leave, he was stripped of his role as the  
11  
12 Corporate Medical Director and ostracized by the group (Mednax) that he  
13  
14 formerly led. In addition to the baseless HR investigation, Dr. Ilg was the  
15  
16 subject of false accusations that he carried a loaded handgun in the hospital and  
17  
18 threatened individuals. In less than twelve months, Dr. Ilg's nearly twenty years  
19  
20 of a pristine medical career was destroyed. He was then terminated in  
21  
22 December 2020 which led to further emotional devastation and despair.

23 During the midst of Dr. Ilg's psychological unravelling, Victim 2 initiated  
24  
25 divorce proceedings against him. Throughout the final year of their marriage,  
26  
27 Dr. Ilg was subjected to violent outbursts and assaulted by Victim 2, but the  
28  
29 criminal charges against her were ultimately dropped. Dr. Ilg found himself in a  
30  
31 contentious divorce, which caused him to further spiral. He was isolated, deeply  
32  
depressed, and was desperately attempting to salvage his reputation, career, and  
family.

1 In an effort to deal with his mental health, Dr. Ilg began mental health  
2 treatment with Dr. Van Wey in December 2019, following a referral by the  
3 Washington Physician's Health Program ("WPHP"). (Van Wey Report at p. 1.)  
4  
5 Dr. Van Wey diagnosed Dr. Ilg with "Adjustment Disorder with Depressed  
6 Mood and Anxiety." (*Id.*) Upon initial treatment, Dr. Van Wey indicates that  
7  
8 Dr. Ilg "described being so negatively impacted by an HR investigation at his  
9 job" and presented with "depressed mood, excessive worries, restlessness,  
10 physical tension, racing thoughts, and apathy." (*Id.*) Dr. Van Wey opines that  
11  
12 Dr. Ilg's "mental health got progressively worse during this time [prior to  
13 December 2020] due in part to persistent employment stressors and the  
14 unfolding of new and serious interpersonal stressors." (*Id.*) Dr. Van Wey  
15 further provides that "by late winter and early spring 2021, Dr. Ilg was fired,  
16 facing divorce and an anti-harassment order, financial loss, and loss of social  
17 connections," which caused his mental health to further deteriorate. (*Id.* at p. 2.)  
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25 Ultimately, Dr. Van Wey opines:

26  
27 When faced with employment stressors, . . . maladaptive emotional  
28 and cognitive reactions related to narcissistic personality features,  
29 depression, and anxiety emerged because he had never faced such a  
30 massive accumulation of stressors in areas that were most important  
31 to him before. . . . His view of the world and others as hostile and  
32 'against him' clouded his ability to constructively solve his  
problems and his need to maintain a controlled outward image was

1 no match for the level of stress he faced. These cognitive patterns  
 2 were part of the reason he sought counseling in the first place—his  
 3 resources were overwhelmed by his circumstances.

4  
 5 (Van Wert Report at p. 2.)

6 Nevertheless, Dr. Van Wey indicates that Dr. Ilg “readily engaged in  
 7 counseling and identified treatment goals.” (Van Wey Report at p. 1.) Dr. Van  
 8 Wey indicates that during their sessions, Dr. Ilg “often shared what seemed to be  
 9 uncomfortable and embarrassing parts of his psychological dynamics and  
 10 behaviors” and “confronted core internal; **dynamics of perfectionism**, feelings  
 11 of inadequacy and insecurity, and **compulsive need for control.**” (*Id.* at p. 2.)  
 12 Dr. Van Wey concludes that his “history of cooperation in therapy suggests that  
 13 Dr. Ilg will not only engage in future treatment opportunities but benefit from it  
 14 so as to promote emotional stability and transition to a low stress life” following  
 15 his release from prison. (*Id.* at p. 3.)

16  
 17 Previously in support of Dr. Ilg’s unsuccessful request(s) for pretrial  
 18 release, he was evaluated by Dr. Stanfill. Dr. Stanfill opined that Dr. Ilg does  
 19 not pose a substantial danger of harming others based upon the Violence Risk  
 20 Appraisal Guide, Revised Version (“VRAG-R”), a validated and commonly-  
 21 accepted actuarial measure, along with the Psychopathy Checklist-Revised  
 22 (“PCL-R”). (Stanfill Report at pp. 3-4.) Dr. Stanfill concluded that Dr. Ilg’s

1 “alleged actions . . . were not the result of a psychopathic outlook or propensity  
 2 towards violence,” but rather “were strongly driven and influenced by various  
 3 other external contributing factors (e.g., loss of work, separation from wife and  
 4 child, etc.).” (*Id.* at p. 4.) Additionally, Dr. Stanfill indicated that “Dr. Ilg [has]  
 5 few psychosocial risks associated with well-researched criminogenic risk factors  
 6 closely tied to recidivism” and had favorable scores on the Level of Services  
 7 Inventory, Revised Versions (“LSI-R”). (*Id.* at p. 7.) Finally, Dr. Stanfill opines  
 8 that “Dr. Ilg should resume regular therapy,” as he had “previously benefited  
 9 from this intervention.” (*Id.* at p. 9.)

10 Should the Court accept the Rule 11(c)(1)(C) Plea Agreement, the only  
 11 substantive issue is Dr. Ilg’s sentence between 60-to-96 months confinement.  
 12 Dr. Ilg respectfully requests to be sentenced to 60 months.

### 13 **POINTS & AUTHORITIES**

14 Title 18, Section 3553(a) directs that “[t]he court shall impose a sentence  
 15 sufficient, but not greater than necessary, to comply with the purposes set forth  
 16 in paragraph (2) of this subsection.” The Court shall consider the “nature and  
 17 circumstances of the offense and the history and characteristics of the  
 18 defendant.” 18 U.S.C. § 3553(a)(1). The Court shall also consider the need for  
 19 the sentence imposed:



(A) to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense;  
 (B) to afford adequate deterrence to criminal conduct;  
 (C) to protect the public from further crimes of the defendant; and  
 (D) to provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner.

18 U.S.C. § 3553(a)(2).

Pursuant to the “remedial regime” established in *United States v. Booker*, 543 U.S. 220 (2005), the “Guidelines are no longer mandatory but are only advisory.” *United States v. Carty*, 520 F.3d 984, 990 (9th Cir. 2008). Nevertheless, the Guideline Range is still “the starting point and the initial benchmark.” *Carty*, 520 F.3d at 991 (quoting *Kimbrough v. United States*, 552 U.S. 85, 108 (2007)). However, the Court “may not presume that the Guidelines range is reasonable,” and the factors contained in 18 U.S.C. § 3553(a) are the overarching guide in the Court’s determination. *Carty*, 520 F.3d at 991; *United States v. Ruff*, 535 F.3d 999, 1003 (9th Cir. 2008); *United States v. Whitehead*, 532 F.3d 991, 993 (9th Cir. 2008). The individual characteristics of Dr. Ilg and the 3553 factors warrant a sentence of sixty months confinement.

#### **A. Individual Characteristics of Dr. Ilg.**

Pursuant to 18 U.S.C. § 3553(a)(1), the Court shall consider “the history and characteristics of the defendant.” Here, the Court is sentencing a former,

1 extremely high functioning Neonatologist who suffered devastating loss of  
2 career, reputation and family. Dr. Ilg had a nearly twenty-year successful career  
3 caring for newborn children in Spokane, rising within his practice group to  
4 become its director, and volunteering with various organizations, including  
5 Maddie's Place, to give back to the community he served as a physician. He  
6 saved the lives of many infants throughout his career.  
7

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9  
10  
11 As indicated above, work-related and personal stressors caused a mental  
12 health crisis with Dr. Ilg. Despite seeking professional help from Dr. Van Wey  
13 and the WPHP, Dr. Ilg spiraled out of control. In the timeframe immediately  
14 leading up to the commission of his crimes, Dr. Ilg had lost his career, his  
15 reputation, and his family. Although nothing excuses Dr. Ilg's criminal conduct,  
16 the impetus of his fall from grace is crucial as his conduct did not occur in a  
17 vacuum.  
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23 Dr. Ilg is extremely remorseful for his actions and will face the  
24 consequences of his conduct for the rest of his life. He was so utterly remorseful  
25 that he attempted suicide in the days immediately proceeding his arrest. A  
26 sentence of sixty months confinement is warranted based upon the individual  
27 characteristics of Dr. Ilg. *See* 18 U.S.C. § 3553(a)(1).  
28  
29  
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32 ///

1 **B. Seriousness of the Offense, Respect for the Law, and Just Punishment.**

2  
3 Pursuant to 18 U.S.C. § 3553(a)(2)(A), the Court must consider the need of  
4  
5 the sentence “to reflect the seriousness of the offense, to promote respect for the  
6  
7 law, and to provide just punishment for the offense.” The crimes for which Dr.  
8  
9 Ilg will be sentenced are undoubtedly serious offenses. However, as indicated  
10  
11 above, Dr. Ilg’s criminal conduct did not happen in a vacuum and was following  
12  
13 severe personal and employment stressors in his life.

14  
15 Similarly, Dr. Ilg has already been incarcerated since April 2021 and will  
16  
17 be subject to significant future prison confinement. In addition to imprisonment,  
18  
19 Dr. Ilg is now a convicted felon, no longer has contact with his toddler son, and  
20  
21 will likely lose his medical license and career. Respect for the law does not  
22  
23 arise by virtue of harsh sentences, but rather when the Court fashions a sentence  
24  
25 that is just considering all the pertinent circumstances. As such, a sentence of  
26  
27 sixty months is a just punishment based upon the seriousness of the offense and  
28  
29 to promote respect for the law. *See* 18 U.S.C. § 3553(a)(2)(A).

30 **C. Specific and General Deterrence of Future Criminal Conduct.**

31  
32 Pursuant to 18 U.S.C. § 3553(a)(2)(B), the Court must consider the need of  
the sentence “to afford adequate deterrence to criminal conduct.” However,  
deterrence does not necessarily even require a period of incarceration. *See*

1 *United States v. Edwards*, 595 F.3d 1004, 1016 (9th Cir. 2010) (law “does not  
 2  
 3 require the goal of general deterrence be met through a period of incarceration”).  
 4  
 5 As it relates to specific deterrence, sixty months confinement is a significant  
 6  
 7 amount of time for a former-physician in his late-50s with no criminal history.  
 8  
 9 For general deterrence, Dr. Ilg has been in custody since April 2021, pled guilty  
 10  
 11 to two felony crimes, and society would be incorrect if sixty months were  
 12  
 13 viewed too lenient. A sentence of sixty months would provide adequate  
 14  
 15 deterrence for Dr. Ilg’s conduct. *See* 18 U.S.C. § 3553(a)(2)(B).

16 **D. Protection of the Public From Further Crimes of Dr. Ilg.**

17 Pursuant to 18 U.S.C. § 3553(a)(2)(C), the Court must consider the need of  
 18  
 19 the sentence “to protect the public from further crimes of the defendant.” As an  
 20  
 21 individual with no criminal history, Dr. Ilg’s confinement at his age and with his  
 22  
 23 professional background is undoubtedly more difficult than most convicts.  
 24  
 25 Additionally, as indicated above both Dr. Van Wey and Dr. Stanfill generally  
 26  
 27 indicate that Dr. Ilg is at a low rate for recidivism if he continues professional  
 28  
 29 counseling. From a practical standpoint, Dr. Ilg is currently fifty-six years old.  
 30  
 31 Following a sixty-month prison sentence (and with credit for time served), Dr.  
 32  
 33 Ilg would be almost sixty years old upon his release. As such, a sentence of

1 sixty months is adequate to protect the public from potential future crimes based  
2  
3 upon Dr. Ilg's low risk of recidivism. *See* 18 U.S.C. § 3553(a)(2)(C).  
4

5 **CONCLUSION**

6 Based upon the foregoing, Dr. Ilg respectfully requests that this Court  
7  
8 accept the Rule 11(c)(1)(C) Plea Agreement and sentence him to sixty months.  
9

10 RESPECTFULLY SUBMITTED this 12th day of January, 2023.

11 ETTER, McMAHON, LAMBERSON,  
12 VAN WERT & ORESKOVICH, P.C.  
13

14  
15 By: /s/ Carl J. Oreskovich

16 Carl J. Oreskovich, WSBA #12779

17 Andrew M. Wagley, WSBA #50007

18 *Attorneys for Defendant Ronald C. Ilg, MD*  
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**CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury of the laws of the United States and the State of Washington that on the 12th day of January, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF System, which will send electronic service to all attorneys of record.

EXECUTED this 12th day of January, 2023 in Spokane, WA.

By: /s/ Jodi Dineen  
Jodi Dineen